

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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J&J SPORTS PRODUCTION, INC.

Plaintiff

Index#: CV 08-4239

-against-

GAF FOOD SERVICES, INC., SIN BANDERAS
JEORGINA J. FLORES & JAVIER FISCAL

Defendant
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PLAINTIFF'S INITIAL DISCLOSURE
PURSUANT TO FED R. CIV. P. 26(A)(1)
OF INTERROGATORIES

Pursuant to the requirement of Federal Rule of Civil Procedure 26, J&J Sports Production, Inc. Plaintiff in the above-titled action, makes the following disclosures by and through its undersigned counsel:

1. Initial Disclosures

(A) The identity of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the Complaint is as follows:

(1) J&J Sports Production, Inc. c/o Thomas P. Riley, P.C., First Library Square, 1114 Fremont Avenue, South Pasadena, CA 91030-3227; having knowledge as to the unauthorized publication and use of the telecast of Oscar De La Hoya and Ricardo Mayorga on May 6, 2006 at the GAF Food Services, Inc..

(2) GAF Food Services, Inc. And Sin Banderas and Jeorgina J. Flores & Javier Fiscal ("Defendant"), 356 Washington Street, Newburgh, NY 12550; knowledge as to the information contained in and relating to the unauthorized publication and use of the telecast of Oscar De La Hoya and Ricardo Mayorga on May 6, 2006 at the GAF Food Services.

(B) All documents, date complications, and tangible things that are in possession, custody, or control of J&J Sports Productions, Inc., may use to support its claims and/or defenses include the following:

- (1) Copy of investigators report;
- (2) Responses to discovery;
- (3) Deposition testimony, if any;
- (4) any other relevant document not yet discovered by

Plaintiff which would be relevant to Plaintiff's case.

The documents are located or will be located at the offices of Thomas P. Riley, PC, First Library Square, 1114 Fremont Avenue, South Pasadena, CA 91030-3227 and Paul J. Hooten & Associates, PLLC, 5505 Nesconset Hwy., Suite 203, Mt. Sinai, New York 11766. There may be other documents that may be relevant that are not yet known which may be used to support the claims and/or defenses of J&J Sports Productions, Inc.

(C) Damages to Plaintiff arising from the Defendant's unauthorized use of the telecast of Oscar De La Hoya and Ricardo Mayorga on May 6, 2006 at the GAF Food Services, Inc. And attorney fees and costs.

(D) Fed.R.Civ. P. 26 (a)(1)(D) does not apply to this matter.

Respectfully submitted,

Date: August 5, 2008

/s/Paul J. Hooten

PAUL J. HOOTEN & ASSOCIATES
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